MIRANT NEW YORK, INC.,	)
Plaintiff,	)
VS.	) Civil Action No. 07-CV-4166 (LAP)
LOCAL UNION NO. 503 OF THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,	) ) ) )
Defendant.	) ) )

### MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Southern and Eastern Districts of New York, I, Piret Loone, a member in
good standing of the bar of this Court, hereby move for an Order allowing the admission
pro hac vice of

Charles A. Gartland II Alston & Bird LLP 1201 West Peachtree Street Atlanta, GA 30309-3424 Telephone: (404) 881-7000 Facsimile: (404) 881-7777

Charles A. Gartland II is a member in good standing of the Bar of the State of Georgia. There are no pending disciplinary proceedings against Mr. Gartland in any State or Federal court.

SU 10-8-4 ST\$ 589619

Dated: **July 2, 207** 

Respectfully submitted,

Piret Loone (PL 6597) ALSTON & BIRD, LLP

90 Park Avenue

New York, NY 10016-1387 Telephone: 212-210-9400 Facsimile: 212-210-9444

Counsel for Plaintiff Mirant New York, Inc.

MIRANT NEW YORK, INC.,	
Plaintiff,	
vs.	Civil Action No. 07-CV-4166 (LAP)
LOCAL UNION NO. 503 OF THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,	) ) ) )
Defendant.	) ) )

# AFFIDAVIT OF PIRET LOONE IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

State of New York County of New York

PIRET LOONE, being duly sworn, hereby deposes and says as follows:

- 1. I am an associate of the law firm of Alston & Bird, LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Charles A. Gartland II as counsel pro hac vice to represent Plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2002. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Mr. Gartland since early 2007.
- 4. Mr. Gartland is an associate at Alston & Bird, LLP in Atlanta, Georgia.
- 5. I have found Mr. Gartland to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
- 6. Accordingly, I am pleased to move the admission of Charles A. Gartland II, pro hac vice.

7. I respectfully submit the order granting the admission of Charles A. Gartland II, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Charles A. Gartland II, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,

Piret Loone (PL 6597) ALSTON & BIRD, LLP

90 Park Avenue

New York, NY 10016-1387 Telephone: 212-210-9400

Facsimile: 212-210-9444

Sworn and subscribed

before me, this which day of

Notary Public

My Commission Expires

KIM FITZGERALD
Notary Public, State of New York
No. 01FI609313
Qualified in Kings County
Certificate Filed in New York County
Commission Expires August 9, 20 2



### **CERTIFICATE OF GOOD STANDING**

UNITED STATES OF AMERICA		
	} s	S
NORTHERN DISTRICT OF GEORGIA	}	

I, James N. Hatten, Clerk of the United States District Court for the Northern District of Georgia,

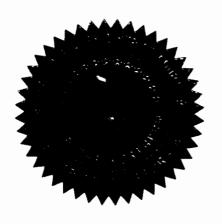
DO HEREBY CERTIFY that CHARLES A. GARTLAND II, State Bar No. 286860, was duly admitted to practice in said Court on February 3, 2003, and is in good standing as a member of the bar of said Court.

Dated at Atlanta, Georgia, this 29th day of June, 2007.

JAMES N. HATTEN **CLERK OF COURT** 

By:

Deputy Clerk



MIRANT NEW YORK, INC.,	
Plaintiff,	
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LOCAL UNION NO. 503 OF THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,	
Defendant.	) ) )

#### ORDER FOR ADMISSION PRO HACE VICE ON WRITTEN MOTION

Upon motion of Piret Loone, attorney for Plaintiff Mirant New York, Inc. and said sponsor attorney's affidavit in support, IT IS HEREBY ORDERED that

Charles A. Gartland II Alston & Bird LLP 1201 West Peachtree Street Atlanta, GA 30309-3424 Telephone: (404) 881-7000

Facsimile: (404) 881-7777

Email: chuck.gartland@alston.com

is admitted to practice pro hac vice as counsel for Plaintiff Mirant New York, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply of an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:	
New York, New York	
	United States District Indoe

MIRANT NEW YORK, INC.,	)
	)
Plaintiff,	)
	)
vs.	) Civil Action No. 07-CV-4166 (LAP)
	)
LOCAL UNION NO. 503 OF	)
THE INTERNATIONAL	)
BROTHERHOOD OF ELECTRICAL	)
WORKERS,	)
	)
Defendant.	)
	)

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2007, a true copy of the foregoing MOTION TO ADMIT COUNSEL PRO HAC VICE and supporting exhibits was mailed, via first-class mail, postage pre-paid to:

Paul A. Montalbano Cohen, Leder, Montalbano & Grossman, LLC 1700 Galloping Hill Road Kenilworth, NJ 07033

> Piret Loone (PL 6597) ALSTON & BIRD, LLP 90 Park Avenue

New York, NY 10016-1387 Telephone: 212-210-9400

Facsimile: 212-210-9444

Counsel for Plaintiff Mirant New York, Inc.